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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT CHARLES CRIST,

Defendant.

CASE NO. 2:22-CR-229-DC

STIPULATION TO CONTINUE SENTENCING  
DATE; ORDER

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. On December 13, 2024, the defendant, Robert Charles Crist, pleaded guilty pursuant to a plea agreement. ECF Nos. 100, 101. Sentencing was scheduled for March 21, 2025, and the Court set a schedule for disclosure of the draft Presentence Report ("PSR") on February 7, 2025, and for filing of objections to the PSR thereafter. ECF No. 102. The draft PSR was filed on March 7, 2025. Thus, additional time is needed for the parties to complete review of the PSR and to raise any objections, and for probation to incorporate any such objections into the final PSR, disclose the PSR, and make its sentencing recommendation.

2. Thus, by this stipulation, the parties now move to continue the judgment and sentencing to May 2, 2025, and to modify the briefing schedule as follows:

1 a) Judgment and sentencing date: May 2, 2025  
2 b) Reply or statement of non-opposition: April 25, 2025  
3 c) Formal objections to the PSR shall be filed with the April 18, 2025  
4 Court and served on the Probation Officer and opposing counsel no  
5 later than:  
6 d) The final PSR shall be filed with the Court and April 11, 2025  
7 disclosed to counsel no later than:  
8 e) Counsel's written objections to the PSR shall be April 4, 2025  
9 delivered to the Probation Officer and opposing counsel no later  
10 than:  
11 3. Such additional time is needed to ensure the defendant has an opportunity to review the  
12 PSR with his attorney and raise any objections. The government does not oppose the continuance.

13  
14 IT IS SO STIPULATED.

15  
16 Dated: March 12, 2025

17 MICHELE BECKWITH  
18 Acting United States Attorney

19 /s/ EMILY G. SAUVAGEAU  
20 EMILY G. SAUVAGEAU  
21 Assistant United States Attorney

22 Dated: March 12, 2025

23 /s/ LINDA HARTER  
24 LINDA HARTER  
25 Counsel for Defendant  
26 ROBERT CHARLES CRIST

## ORDER

In light of the time needed for the parties to complete review of the draft Presentence Report and to raise any objections, and for Probation to incorporate any such objections into the final Presentence Report, disclose the final Presentence Report, and make sentencing recommendations, the parties' stipulated request to continue is GRANTED. Accordingly, the Sentencing Hearing set for March 21, 2025 is VACATED and RESET for May 2, 2025 at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins. It is FURTHER ORDERED that the parties' proposed briefing schedule is ADOPTED as set forth above.

IT IS SO ORDERED.

Dated: March 13, 2025

  
Dena Coggins  
United States District Judge